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September 29, 2021

VIA ECF

Honorable André M. Espinosa
United States District Court
District of New Jersey
Martin Luther King, Jr. Courthouse
50 Walnut Street
Room 2037, Courtroom 2D
Newark, NJ 07102

**RE: Dotcom Distribution Corp. v.
Travelers Property Casualty Company of America and
The Phoenix Insurance Company
No. 2:20-cv-17871**

Dear Judge Espinosa:

The parties jointly submit this letter in the above-referenced matter concerning the discovery dispute deadline.

Per the Scheduling Order [ECF No. 15], “[a]ny unresolved discovery disputes (other than those that arise during depositions) must be brought before the Court **no later than October 1, 2021** and the Court will not entertain applications concerning discovery matters, informally or otherwise, after this date.”

The Court recently extended the fact discovery deadline to January 1, 2022. *See* Court’s Order dated September 22, 2021 [ECF No. 27]. We write to the Court to confirm that the October 1, 2021 deadline is extended in accordance with the Court’s recent order.

Honorable André M. Espinosa
September 29, 2021
Page 2

The parties agree to extend the discovery dispute deadline to December 1, 2021.

Respectfully submitted,

FLASTER/GREENBERG P.C.

By: /s/ Arthur R. Armstrong

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The Court will consider any discovery disputes that arise before the close of fact and expert discovery. SO ORDERED.

Dated: October 4, 2021

/s/ André M. Espinosa
ANDRÉ M. ESPINOSA, U.S.M.J.